

94 RF 04097

EG&G ROCKY FLATS

052494-3

DIST	
AMARAL M E	
BERMAN H S	
BRANCH D B	
CARNIVAL G J	
COPP R D	
DAVIS J G	
FERRERA D W	
HANNI B J	
HARMAN L K	
HEALY T J	
HEDAHL T G	X
HILBIG J G	
HUTCHINS N M	
KELL R E	
KIRBY W A	
KUESTER A W	
MAHAFFEY J W	
MANN H P	X
MARX G E	
M DONALD M M	X
M KENNA F G	X
MONTROSE J K	
MORGAN R V	
POTTER G L	
PIZZUTO V M	
RISING T L	
SANDLIN N B	
SETLOCK G H	
STEWART D L	
STIGER S G	X
SULLIVAN M T	
SWANSON E R	
WILKINSON R B	
WILSON J M	X
WYANT R B	
Fiehw g, R E	X
B S FLORA	X
J M B II	X
e W II	X
A L K k	X
G D POLING	X
K Koebel	X
FI	X
CORRES CONTROL	X X
ADMIN RECD/080	
TRAFFIC	
PATS/T130G	

EG&G ROCKY FLATS INC  
ROCKY FLATS PLANT P O BOX 464 GOLDEN COLORADO 80402 0464 (303) 966-7000

MAY 1994  
RECEIVED

May 18 1994

94 RF 04097

Michael S. Karol  
Assistant Manager for  
Project Management and Engineering  
DOE RFFO

SEWAGE TREATMENT PLANT UPGRADES MMM 058 94

#### PURPOSE

The purpose of this letter is to inform the Department of Energy/Rocky Flats Field Office (DOE/RFFO) of the need to place on hold Phase III of the Sewage Treatment Plant (STP) Upgrades until the renewed National Pollutant Discharge Elimination System (NPDES) permit is agreed upon and issued by the Environmental Protection Agency (EPA)

#### DISCUSSION

Phase III of the STP Upgrades is an authorization for implementation of the requirements of the NPDES Federal Facilities Compliance Agreement (FFCA) between the EPA and the Department of Energy (DOE) Phase III was authorized in 1990 for \$4 6 million dollars but has been delayed for numerous reasons including the 1993 request by the EPA (attachment 1) The current Rocky Flats Plant NPDES permit expired in June 1989 but has been administratively extended until a new permit is issued It is expected that the new permit will contain a compliance schedule for the installation of some Phase III components

A draft of the new NPDES permit was received from the EPA on February 23 1994 and EG&G has transmitted comments to the DOE/RFFO DOE legal counsel may challenge several issues contained within the permit including jurisdiction over RFP water and legal authority over radionuclides In addition one Phase III item in the new permit (500 000 gallon storage tanks) has been proposed by DOE to be included as an Interagency Agreement (IAG) milestone for the Industrial Area Interim Measures/Interim Remedial Action Plan

These actions are causing scheduling and performance problems or Phase III of the STP Upgrades Project With potential litigation and other regulatory agreements being contemplated by DOE/RFFO the current project plan for cost and schedule has no basis and is obsolete

#### RESPONSE REQUIREMENT

Since these issues directly impact EG&G's development of a schedule for the STP Phase III Upgrades we are requesting that DOE/RFFO concur with this indefinite delay or provide EG&G with the Department's expectations for resolving the disputed portions of the IAG and

#### CLASSIFICATION

UCNI	
UNCLASSIFIED	X
CONFIDENTIAL	
SECRET	

#### AUTHORIZED CLASSIFIER

SIGNATURE

Date

IN REPLY TO RFP CC NO

N/A

#### ACTION ITEM STATUS

☐ PARTIAL/OPEN  
☒ CLOSED

#### LTR APPROVALS

Manager

Director

Benjamin

ORIG & TYPIST INITIALS

GDP dcb



000030121

DOCUMENT CLASSIFICATION  
REVIEW WAIVER PER  
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ADMIN RECORD

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the issues in contention in the draft NPDES permit The DOE s expectations will be incorporated into the baseline schedule for this project allowing EG&G to plan for the completion of the STP Phase III Upgrades



M M McDonald  
Acting Associate General Manager  
EG&G Rocky Flats Field Office

GDP dcb

Orig and 1 cc M S Karol

Attachment  
As Stated

cc  
L Bressler DOE, RFFO  
R L Craun  
P Hartung  
M S Karol  
S Olinger  
M J Roy  
J E Springer